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October 13, 2003

VIA ELECTRONIC FILING

Marlene Dortch, Secretary,
Federal Communications Commission
445 12th Street SW
Room TWB-204
Washington, DC 20554

Re: *Ex Parte Presentation:* WC Docket 03-167, Application By SBC Communications Inc. For Authorization Under Section 271 of The Communications Act to Provide In-Region, Inter LATA Service in the States of Illinois, Ohio, Indiana and Wisconsin

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's Rules, Mpower Communications Corp. ("Mpower) submits this ex parte presentation in the above-captioned proceeding.

Mpower has demonstrated in this proceeding that SBC-Illinois does not meet the requirements of Checklist Item 2 of the Section 271 Checklist. Specifically, SBC has failed to properly bill Mpower for trip charges associated with approximately 14,000 trouble tickets over the past 14 months. SBC is well aware of the problems with its Illinois billing, and Senior SBC Executive Larry Cooper, Vice President for Industry Markets, acknowledged the seriousness of those billing problems in August 2003 when he agreed to negotiate a resolution to the longstanding trouble ticket billing issue with Mpower. Later, when the results of the settlement methodology Mr. Cooper agreed to lead to a finding of 93% inaccuracy, SBC reneged on the settlement agreement.

Mpower's experience with SBC's deficient billing for trouble tickets was implicitly acknowledged by the Illinois Commerce Commission ("ICC") in its decision to recommend approval of the SBC-Illinois 271 application earlier this year. In its order the ICC concluded that SBC's OSS system was deficient in that it failed to accurately close out trouble

tickets.[1] As a condition of approving SBC's Illinois application, the ICC required SBC to obtain verification from an independent third party by November 2003 that the trouble close-out coding problem was fixed. While SBC claims to have met this condition as of September 18, 2003, SBC has provided no Illinois specific data on the issue and, as evidenced by Mpower's filings in this proceeding and the problem remains unresolved.

On May 1, 2003, in response to the ICC's order, SBC filed its "Special and UNE Circuit Repair Coding Accuracy Plan," ("Coding Accuracy Plan") attached hereto as Exhibit A, which mirrored in most respects the plan that SBC was required to file by the Michigan commission in that state's 271 proceeding. The Coding Accuracy Plan required that SBC file bi-monthly reports of third party examination results until such time as the coding accuracy problem was deemed to have been resolved.

SBC filed reports with the ICC in June, August and September 2003 (attached hereto as Exhibit B). However, the so-called "accuracy reports" filed by SBC in the Illinois 271 docket are not worth the paper they are written on. **They provide no actual Illinois coding accuracy performance data**. In fact, the September 18 report is the only report that purports to show any actual coding results at all, **but the September 18 still included no Illinois specific UNE trouble coding data**. Instead, the report purports to provide the results of a "commercial transaction review," which looked only at 154 randomly selected "commercial troubles completed in the month of June 2003," however, **all 154 troubles examined came from Michigan.**[2] **No UNE troubles for Illinois were ever examined**.

Nonetheless, SBC claims in its September 18 ICC filing that for the month of June 2003 "SBC Midwest achieved a UNE repair coding accuracy of 98.38 percent," and having met the 95 percent target accuracy required by the ICC, SBC will file no further status reports.[3] Remarkably, SBC's claim of compliance in the Illinois docket contains no Illinois specific data, only Michigan. Mpower submits that it is absolutely disingenuous for SBC to extrapolate one month of Michigan performance across the entire region, particularly when Mpower's own experience in Illinois is so completely at odds with SBC's assertions. The Commission must look beyond SBC's baseless assertions of compliance and the meaningless data that it has provided that has obviously failed to capture SBC's performance as it relates to the provision of wholesale service to Mpower.

Despite senior SBC executives having affirmatively acknowledged the severe trouble code accuracy problem as it pertains to Mpower, throughout this proceeding SBC has

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1 *See* Illinois Commerce Commission On Its Own Motion Investigation Concerning Illinois Bell Telephone Company's Compliance with Section 271 of the Telecommunications Act of 1996, ICC Docket No. 01-0662, Final Order, ¶ 898 (May 2, 2003).

2 *See* Repair Coding Accuracy Third Party Examination Results at 14 (included in Exhibit B).

3 *Id.*

denied its existence. SBC has failed to demonstrate that it has corrected the problem that led to SBC incorrectly billing Mpower for trip charges on thousands of occasions. The data cited by SBC in support of its assertion that there is "no problem," including the Illinois performance metrics and the Coding Accuracy Plan, do not provide any evidence that the issue has been resolved.

Respectfully submitted,

Ross A. Buntrock

cc:

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Irshad Abdal-Haqq
Layla Seirafi-Najar (DOJ)

EXHIBIT A

ICC Docket No. 01-0662

Special and UNE Circuit Repair Coding Accuracy Plan

May 1, 2003

Repair Coding Accuracy Plan

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1. Purpose

The purpose of this plan is to describe the actions the Illinois Bell Telephone Company ("SBC" or "SBC Illinois") proposes to take to further improve accuracy and completeness[1] of closeout codes upon repair completion for Special Circuits and Unbundled Network Elements (UNEs).

The Michigan plan[2] (upon which this Illinois plan is based) was developed pursuant to the Michigan Public Service Commission's ("MPSC's") Order issued January 13, 2003, in Case No. U-12320 (SBC's §271 Checklist Compliance Docket) as a result of extensive discussion with MPSC staff and CLEC Industry Collaborative.[3] SBC has retained BearingPoint to evaluate SBC's implementation of this plan. On March 26, 2003 the MPSC approved this plan as submitted with minor modifications on March 13, 2003. Final modifications were made to this plan in compliance with the MPSC's Order issued March 26, 2003 and resubmitted to the MPSC on April 2, 2003.

The only difference between the repair coding accuracy plans submitted for Michigan and Illinois is the scope of the management review activities underway in each of the affected work centers. In Michigan, the reviews include closeout codes applied to trouble reports for both Special and UNE circuits. This is appropriate since coding accuracy for Special and UNE circuits did not pass BearingPoint's test requirements. In Illinois, however, only the Special circuits failed to pass the BearingPoint test. As such, the management reviews in Illinois are limited to the coding applied to Special circuits. Most other activity described below, including the documentation updates and the awareness and training sessions, have and will continue to be applicable to all circuit categories.

2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first issued Exception 131 as part of the Third-Party Operations Support Systems ("OSS') testing on June 27, 2002. In its report, BearingPoint stated that in reviewing trouble reports and close out code data, it determined that SBC had failed to meet a 95% accuracy benchmark for trouble ticket closure coding for Special circuits. The initial exception report for Illinois had included benchmark failures for Resale, UNE and Special circuits. In the course of resolving this issue, BearingPoint completed a retest of repair coding accuracy in December 2002 and reported that while Resale and UNE circuits had passed their test requirements, Special Circuits had not. This exception encompassed all five Midwest states. BearingPoint's December 20, 2002 Illinois OSS Evaluation Project Report found that test criteria

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[1] AT&T stated, "accuracy is equally important as completeness." See, 11/15/02 Connolly Affidavit filed with the MPSC, p. 36, para 83

[2] The Michigan Plan included UNEs due to Michigan Bell not passing the BearingPoint test for this product set. In the Illinois BearingPoint test, Illinois Bell passed this test and therefore it is not specifically included in this plan.

[3] The MPSC ordered the implementation of this plan to further improve SBC's repair coding accuracy. The MPSC was clear, however, that the plans were not required to demonstrate that SBC was "... in compliance with each of the Section 271 competitive checklist items, including each of the areas addressed by the modified compliance and improvement plans." (MPSC Order, March 26, 2003, Case No. U-12320, page 2.)

for TVV7-14 (p. 763) was "not satisfied." Within the five Midwest states, Resale coding has successfully closed in all five states, the UNE coding has successfully closed in four states (i.e., Illinois, Indiana, Ohio and Wisconsin) and Special coding remains in unsatisfied in Illinois, Indiana, Michigan and Ohio. Wisconsin has successfully completed Special circuit coding retesting.

In response to BearingPoint's evaluation, SBC has identified areas for improvement and implemented a number of corrective measures, which as summarized above, have improved the performance results in those states where the retest was conducted after those corrective measures were implemented. In its final retest in Illinois, BearingPoint reported that 87.5% (28/32) of Special circuits and 94.8% (128/135) of UNE closeouts were coded correctly. It should be noted that these coding results were in parity with retail coding and that SBC successfully passed BearingPoint testing on trouble repair itself, thus indicating that SBC provides nondiscriminatory access to its maintenance and repair ("M&R") systems and services

3. Root Cause Analysis

Trouble tickets are closed out by the repairing technician in the field or in the central office, either directly or through the Overall Control Center ("OCO") which encompasses the Local Operations Center ("LOC") and the Customer Service Bureau ("CSB") for UNE troubles, and the Special Services Center ("SSC"), for Special circuits. When the repair is complete, the technician also enters the appropriate closure codes to the ticket. The closeout code faults reported by BearingPoint within this exception appeared to fall into one of the following general situations:

1) Situations in which a fault inserted by BearingPoint were subsequently reported as "No Trouble Found" (NTF) by SBC.
2) Situations in which the fault inserted by BearingPoint on the network side of the circuit were subsequently reported as being within the customer-owned portion of the circuit and for which CLEC billing was applied.
3) Situations the same as Item #2 above, but no CLEC billing was applied.
4) Situations in which the fault inserted by BearingPoint on the network side of the circuit was properly repaired, but the coding used did not accurately identify exactly where the fault had occurred.

Very few of the items in Situation #1 above involved cases in which SBC clearly miscoded the actual trouble cause and repair. Most of the cases involved situations in which BearingPoint had inserted multiple faults in the same test bed area for several test circuits. While dispatched to repair the fault on one circuit, the technician noticed faults placed on several additional circuits[4] and repaired them as well. The technician corrected the multiple faults but did not document the work performed on those additional circuits that needed repair, but were not listed on the trouble ticket for the test circuit. Therefore, when dispatches were made on the reported failures of the additional circuits, the dispatched technician appropriately closed the report as "NTF".

For items that fell within Situation #2 and #3, some of the errors appear to have been caused by a lack of attention to, or unfamiliarity with, the meaning of each disposition code. Others were

[4] Usually jumpers opened and laid back on the Main Distributing Frame (MDF) in the Central Office.

similar to Situation #1 described above. These involved situations whereby the problem was cleared prior to dispatch. However, instead of listing the cause as "NTF", the technician assumed that an intermittent fault may reside within the CPE portion of the circuit.
Similarly, the items found to fall into Situation #4 appear to be mostly due to errors by the repair technician or maintenance administrator. These types of closeout errors had no impact on overall billing/performance error rate because they mostly involved incorrect coding of the location in the SBC network that the fault was corrected.

Accordingly, with the exception of Situation # 1, the root cause for incorrect close out codes was repair technician error, either in the field, the central office or by the LOC Maintenance Administrators ("MAs") and the Special Service technicians.

4. Actions

The internal improvement plan originally proposed by SBC in Michigan and Ohio was constructed to address the accuracy of trouble ticket closure coding for various types of trouble conditions found including troubles noted as "No Trouble Found" ("NTF") and Customer Premises Equipment ("CPE"). The plan included many of the steps identified in this plan.

In Michigan, the MPSC in its January 13 Order directed that an independent third party verify the results achieved from this plan. It also directed SBC to include evaluation criteria by which the third party could measure whether the corrective actions resulted in improved coding accuracy. As such, the plan now includes third-party verification. The plan has also been enhanced to address specific concerns raised by certain parties in the Michigan proceeding. These enhancements also address concerns raised by certain CLECs in the Illinois proceeding. For example, McLeod USA and TDS expressed concerns that the plan would be eliminated as soon as SBC received 271 authorization and that there was no mechanism in place to measure performance over the long term.[5] Furthermore, they opined that training and review sessions should continue over the next three years.[6]

The following activities identify the steps that SBC has taken for UNE, Resale and Specials or plans to take to improve the accuracy and completeness of trouble ticket closure coding for Special circuit repairs.

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[5] ALJ Proposed Order, April 8, 2003 at ¶1294.

[6] *Id.* at ¶ 1296.

Repair Coding Accuracy Plan

Documentation Updates:

During the course of its investigation of the errors noted by BearingPoint in Exception 131, SBC has initiated a number of improvements in the documentation available to technicians and their managers on proper coding techniques and application. These improvements include:

- The SBC document that is used as a reference for Cause Codes was updated to clarify use of Cause Code 600 in late June 2002. Cause Code 600 is used to identify those situations where SBC is unable to determine what caused a particular case of trouble. This documentation gap was identified via a number of cited trouble tickets for both Special and UNE circuits. The updates to the documentation provided a clearer description of the process currently followed by SBC technicians and addressed questions raised by BearingPoint. The updated SBC document was provided to BearingPoint for review on August 1, 2002.

- Local Operations Center Job Aid JA-27B has been updated to reflect additional steps for Maintenance Administrators to take that will improve coding accuracy when a mechanized loop test ("MLT") indicates "Open Out"[7] following a circuit retest. MAs and managing supervisors responsible for the accurate coding of closed trouble tickets in the LOC were covered on this process enhancement between August 1 and August 9, 2002.

- SBC updated internal Methods and Procedures ("M&P") documentation (SBC 660-169-013) used to define accurate disposition coding of trouble tickets to include new disposition codes and clarify the use of existing disposition codes. Updates to the M&P were completed on August 16, 2002. These updates also generated the following outputs:
  - Installation and Repair (I&R) internal Job Aid (JA 170 - August 20) was updated to reflect the M&P changes/clarifications.
    - Awareness sessions were conducted 8/23/02 through 11/05/02 to review updated procedures.
  - A LOC "Flash" (02RC49) was issued 8/26/02 to reflect the new disposition codes.
  - The CSB Handbook was updated 8/26/02 to reflect the new disposition codes.
    - Issued a CSB "Flash" to notify CSB personnel of updated handbook procedures.

- December 16, 2002 Central Office Technician method and procedure documentation (SBC 002-216-298) was issued for documenting corrective maintenance trouble tickets in central offices (COs). A requirement for performing quality checks on coding has also been incorporated into the frame management document SBC 002-531-045 ("CO Managers Frame Reference Guide – AIT Region").

[7] "Open out" condition on a MLT means a circuit trouble is testing beyond the SBC Central Office.

Repair Coding Accuracy Plan

Training Review Sessions:

SBC has conducted comprehensive awareness and training sessions with personnel in each of the four work groups involved in trouble ticket closures. In those states where BearingPoint testing continued beyond the date(s) when such sessions were completed, test results indicated marked improvement in coding performance. These sessions included:

- SBC conducted training review sessions (a/k/a awareness sessions) to reinforce current procedures used for the close out of Cable Multiple tickets when wholesale account trouble tickets are attached to the lead cable trouble ticket number. Sessions covering all I&R Operations Center personnel were completed by August 13, 2002. A "Cable Multiple" ticket number is assigned to a damaged cable or cable failure that potentially impacts service to multiple subscribers served by the same cable. Individual subscriber (or CLEC) reports of service interruptions having individually assigned trouble ticket numbers may become attached to the lead or Multiple Cable Trouble Ticket Number ("CTTN"). SBC was made aware that in at least two audited instances, individual wholesale trouble reports attached to a Cable Trouble Ticket Number were closed as the CTTN closed and were not "detached" and tested to confirm restoration of the reported trouble. Reinforcement of current procedures to detach individual case trouble tickets from the CTTN and retest with the CLEC was completed for I & R Operations Center employees through Awareness Sessions conducted between August 8 and August 15, 2002.

- SBC conducted awareness sessions to reinforce current procedures used for the disposition coding of trouble reports closed when multiple faults are found on the same telephone line.
    - Sessions covering Installation and Repair field technicians in all manager groups were completed by August 12, 2002.
    - Additional training sessions with I&R personnel were conducted in November 2002.

- Additional review sessions for LOC personnel were conducted to reinforce accurate trouble closure procedures were completed by November 10, 2002.

- Review training sessions were conducted with Special Service Center personnel to reinforce correct trouble ticket coding procedures. These review sessions were completed by November 25, 2002.

- Review sessions were conducted through January 31, 2003 with SBC Midwest Central Office technicians in Michigan, Ohio, Indiana and Illinois[8] manager groups to review the newly created Methods and Procedures for documenting trouble tickets and established procedures for proper trouble ticket coding.

[8] Since Wisconsin passed, trouble ticket coding these review sessions were not conducted.

- A coding refresher review session will be conducted within each of the four work groups (i.e., Special Services Center and Central Office) within one year of the training sessions described above.

- Training packages for new technicians in all work centers already contain trouble disposition and coding and will continue to be part of the training program.

Management Review Activities

To verify that the improvements to documentation and the training/awareness sessions have had the desired affect (i.e., improvement in coding performance), SBC is conducting its own internal reviews of Special circuit trouble ticket closures in both of the work groups involved. These reviews, which will be conducted over the next three years, focus both on closeout coding in general, as well as specific problems brought to the attention of SBC by individual CLECs (e.g., NTFs). These reviews include:

1) Special Services Center

- To monitor the accuracy and completeness of trouble ticket coding, trouble ticket coding review has been incorporated into the regularly scheduled quality control measures utilized by the Special Services management. This effort began December 2002.

2) Central Office

- Beginning in March 2003, a monthly sample of closed CLEC trouble tickets in Illinois will be reviewed for narrative and coding accuracy.

In addition to these targeted coding review sessions SBC has incorporated trouble ticket coding into its internal ISO audits which are conducted approximately every three months within the various work centers. If significant ticket coding problems are identified during these ongoing audits, SBC will initiate new training/awareness sessions with the groups involved.

SBC acknowledges that the "original source information" as noted by AT&T[9] is not available in the above-cited improvement measures. However, SBC believes that these measures will improve the accuracy of trouble ticket coding based on the types of errors noted by BearingPoint in the test. This improvement will be demonstrated through the Third Party evaluation.

[9] See AT&T's comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83

Repair Coding Accuracy Plan

The following provides the timelines and current status of each of the items contained in the actions noted above:

	Task	Begin	End	Status
1.	Update documentation for Cause Code 600	06/01/02	06/30/02	Complete
2.	Update LOC Job Aid JA-27B	07/31/02	08/01/02	Complete
	A. Conduct Job Aid Training	08/01/02	08/09/02	Complete
3.	Develop "awareness" training and conduct sessions with Installation & Repair Operations Center personnel to review procedures for "Cable Multiple" trouble tickets	08/01/02	08/08/02	Complete
	A. Conduct "Awareness" sessions	08/08/02	08/15/02	Complete
4.	Develop awareness training for I&R personnel to reinforce coding of trouble tickets when multiple faults are on the same line	08/10/02	08/11/02	Complete
	A. Conduct awareness sessions	08/11/02	08/12/02	Complete
5.	Update Methods and Procedures to include two new disposition codes and clarifications of existing codes.			
	A. I&R internal job aids were updated to reflect M&P changes/clarification	08/20/02	08/30/02	Complete
	B. Conduct I&R awareness sessions to review updated job aids	08/23/02	11/05/02	Complete
	C. Issue LOC "Flash" to advise of new disposition codes	08/26/02	08/26/03	Complete
	E. Issue CSB "Flash" to advise of handbook updates with new disposition codes	08/26/02	08/26/03	Complete
6.	Update Central Office M&P for trouble ticket closure			
	A. Conduct review sessions with Central Office technicians	12/17/02	1/31/03	Complete
	B. Initiate internal reviews of closed CLEC trouble tickets	03/01/03	04/01/06	Ongoing
7.	Conduct review training sessions with Special Service Center personnel	11/20/02	11/25/02	Complete
8.	Incorporate quality reviews of trouble tickets into current Special Service Center quality control measures	12/01/02	04/01/06	Ongoing
9.	Expected start of BearingPoint testing[10]	07/01/03		
10.	Conduct refresher review session with the Central Office and Special Service Center work centers	08/01/03	12/01/03	

[10] BearingPoint may elect to affirm SBC's documentation improvements and internal reviews prior to this date.

5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in the "Actions" section of this plan which pertain to Special Circuit Trouble Ticket Coding by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. . This evaluation will include a review of SBC's quality review results. SBC expects this process evaluation to begin shortly after the ICC approves this plan with a final report pursuant to BearingPoint's project plan.

- The third party will report on coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found Special Circuits to the narrative contained in the trouble report using a nonbiased sample from commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and the MPSC staff prior to its implementation. SBC expects BearingPoint will begin its analysis of commercial production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint's project plan. The accuracy and completeness of closure codes for Special Circuit repairs is expected to improve the level of accuracy as reported by BearingPoint with test results of 87.5% for Special Circuits[11]. If the third party evaluation does not show an improvement for Special circuits has been achieved, any further required actions will be determined by the ICC.

- SBC will file bimonthly third party reports beginning with April-May 2003 period, to be filed by June 15th, until final process and transactions reports are completed. These reports will be filed with the ICC by the 15th of the following month and served on the parties of record for ICC Docket No. 01-0662.

6. Additional Reporting

SBC will provide quarterly reports for three years to the ICC of the results of ongoing management activities, along with its assessment of whether the results indicate that further refresher training is appropriate or has been conducted. For each of the work centers involved, the reports will include the following information:

[11] See BearingPoint Exception 131, Disposition Report, December 20, 2002

1) the quantity of tickets reviewed;
2) percent or quantity found accurate;
3) follow-up activities taken (if needed).

Although the management reviews in Illinois will be limited to trouble ticket closures on Special circuits, SBC will provide the ICC with the results of the management reviews of UNE circuit trouble ticket closures in Michigan as well.

EXHIBIT B

June 10, 2003

Progress Report
SBC Midwest Plan Examination - Repair Coding Accuracy Plan

I. INTRODUCTION

SBC Midwest has filed plans pertaining to Directory Listings and Directory Assistance Database Update Accuracy, Customer Service Record Update Accuracy, and Repair Coding Accuracy. Each plan states that a third-party examination is to be conducted during and after SBC Midwest has completed specified actions. This document explains the current accomplishments and next steps in BearingPoint's analysis of SBC Midwest's actions related to the Repair Coding Accuracy Plan.

II. ACCOMPLISHMENTS

General Planning and Coordination

BearingPoint provided project and examination plans for the Repair Coding Accuracy Work Plan. These plans provide a high level outline of BearingPoint's methodology and anticipated timeframes.

BearingPoint held meetings with SBC representatives on May 14, May 22, and May 29, 2003. The purpose of these meetings was to discuss the examination plan in more detail.

BearingPoint met with SBC representatives on May 28, 2003 and discussed ways for both companies to ensure timely delivery of required documentation and to schedule interview or site visit opportunities. Additionally, the selection of work centers or work groups to visit was discussed. SBC provided a master list of locations from which BearingPoint will select as necessary for examination purposes.

On June 2, 2003, SBC hosted a conference call between BearingPoint and SBC representatives to review project plan deliverables and dates. BearingPoint indicated that the final delivery date is still on target.

On June 5, 2003, BearingPoint met with SBC and discussed the scheduling of the remaining activities to meet the project plan schedule.

Review of Plan Actions

On May 28, 2003 BearingPoint and SBC met and reviewed the artifacts of the action plan. SBC provided a master binder of documentation comprised of methods, job aids and other documentation making up the bulk of required artifacts. BearingPoint received the documents on June 2, 2003 after the

documentation was appropriately stamped "confidential" and is currently conducting a more detailed review.

Review of Transactions

On May 28, 2003 BearingPoint and SBC spoke briefly about the transaction review process.

On June 5, 2003, BearingPoint met with SBC and discussed the transaction review process in more detail. Both companies agreed to schedule activities the following week to refine the planned process for obtaining the master list of troubles, selecting samples and obtaining detailed history reports from which the coding review would take place.

Also on June 5, 2003, the language in the "EXAMINATION APPROACH Repair Coding Accuracy" document dated March 13, 2003 was reviewed to confirm exactly which troubles would be included in the sampling pool. It was agreed that the UNE troubles would be drawn exclusively from Michigan, but that Specials would be taken from all five states.

On June 6, 2003, BearingPoint and SBC agreed on a Data Request format used for BearingPoint to request documentation and transaction data.

III. NEXT STEPS

1. BearingPoint will continue to perform the detailed review of documentation provided by SBC which demonstrate evidence of process and documentation changes associated with trouble ticket coding, training of work groups, and quality reviews established to evaluate results and improve the on-going accuracy.

2. BearingPoint will determine where interviews and site visits will be necessary. Selections will be made via the data request process. SBC will schedule the visits to meet BearingPoint's work plan schedule.

3. BearingPoint will refine the transaction sampling methodology and locations for technician ride-alongs.

4. Starting on or around the week of June 30, 2003, BearingPoint is planning to begin the transaction review component of this examination. BearingPoint is planning on examining a minimum sample of 150 UNE trouble reports[1] and 35 Special Service troubles throughout the course of a three-week period. SBC will have sample trouble ticket data extracted from the data repositories using existing report formats, which have the data elements required by BearingPoint

[1] UNE Troubles are examined in Michigan only.

and are believed to meet the needs of the test. BearingPoint will review these reports and request changes or modifications if needed. SBC expects to provide these sample reports by June 13, 2003. Once the format is established, BearingPoint will develop the process for selecting transaction samples.

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission On Its Own Motion	)	
	)	
Investigation Concerning Illinois Bell Telephone Company's compliance with Section 271 of the Telecommunications Act of 1996	)	**Docket No. 01-0662**

SBC ILLINOIS' EIGHTH STATUS REPORT

Illinois Bell Telephone Company ("SBC Illinois" or the "Company"), by its attorneys, hereby files three (3) status reports pursuant to the progress plans implemented by the Company as part of the 271 review process[1]. As required under the Plans, SBC Illinois will make periodic status reports to the Commission and will file those status reports in this docket.

In this filing, the Company submits a status report on the following plans:

1. Directory Listings & Directory Assistance Database Update Accuracy Plan – Bimonthly reports, beginning June, 2003 are due under this plan. The report for August, 2003 is attached.

2. Customer Service Inquiry Plan – Bimonthly reports, beginning June, 2003 are due under this plan. The report for August, 2003 is attached.

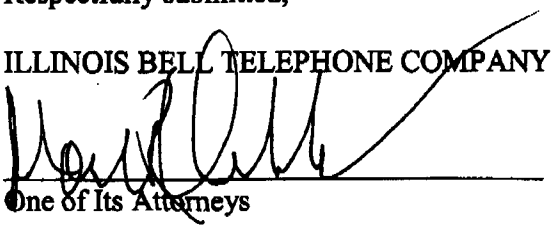
3. Special and UNE Circuit Repair Coding Accuracy Plan – Bimonthly reports, beginning June, 2003 are due under this plan. The report for August, 2003 is attached. Also due under this plan are quarterly reports of the results of on-going management activities. The

[1] The progress plans implemented by the Company include:
1.Bill Auditability and Dispute Resolution Plan;
2. Change Management Communications Plan;
3. Customer Service Inquiry Accuracy Plan;
4. Directory Listings & Directory Assistance Database Update Accuracy Plan,
5. Line Loss Notifier Communications Plan;
6. Pre-Order Processing Timeliness Plan;
7. Special and UNE Circuit Repair Coding Accuracy Plan; and

quarterly report for July, 2003 was included as part of SBC Illinois' Sixth Status report filed on July 31, 2003.

Respectfully submitted,

ILLINOIS BELL TELEPHONE COMPANY



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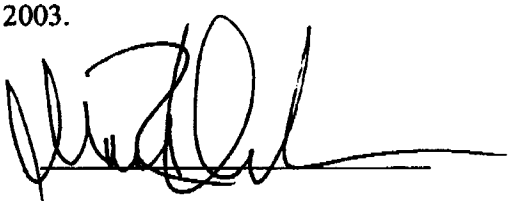
8. Service Order Completion Timeliness Plan (hereinafter, the "Plans").

CERTIFICATE OF SERVICE

I, Mark R. Ortlieb, an attorney, certify that a copy of the foregoing **SBC ILLINOIS' EIGHTH STATUS REPORT** was filed with the Commission via e-docket and served upon all parties electronically on this 15th day of August, 2003.



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August 12, 2003

BearingPoint

Progress Report
SBC Midwest Plan Examination - Repair Coding Accuracy Plan

I. INTRODUCTION

SBC Midwest has filed plans pertaining to Directory Listings and Directory Assistance Database Update Accuracy, Customer Service Record Update Accuracy, and Repair Coding Accuracy. Each plan states that a third-party examination is to be conducted during and after SBC Midwest has completed specified actions. This document explains the current accomplishments and next steps in BearingPoint's analysis of SBC Midwest's actions related to the Repair Coding Accuracy Plan since the last progress report dated June 10, 2003.

II. ACCOMPLISHMENTS

General Planning and Coordination

On June 18, 2003, BearingPoint met with members of the InterExchange Carrier Center (IECC) and General Business Center-East (GBC-E) Special Service Centers in Detroit, Michigan to review process documentation, training documentation, quality review documentation and to observe work in progress as it relates to trouble ticket coding and quality reviews.

On June 19, 2003, BearingPoint met with Installation and Repair (I&R) Field Management and craft employees in Southfield, Michigan to review process documentation, training documentation, quality review documentation as it relates to trouble ticket coding and quality reviews.

On June 19, 2003, BearingPoint met with members of the I&R Control Center and Support Staff in Southfield, Michigan to review process documentation, training documentation, quality review documentation as it relates to trouble ticket coding and quality reviews in the control center. Additionally, BearingPoint was given a process overview and walk through of the newly implemented staff coding review performed for the 70 Area Manager domains monthly, by the Staff Results Manager.

On June 25, 2003, BearingPoint interviewed the SBC Midwest Quality Assurance Manager responsible for the ISO9000 audit and review process. This interview provided BearingPoint a description of the ISO9000 process, the qualifications and training of auditors, the work center audit process and executive reports generated. This interview also provided information on the process used to evaluate trouble coding accuracy during official audits and follow up corrective measures, as required.

On July 1, 2003, BearingPoint met with members of the Local Operations Center (LOC) in Milwaukee, Wisconsin to review process documentation, training documentation, quality review documentation and to observe work in progress as it relates to trouble ticket coding and quality reviews. Additionally, BearingPoint was provided a process overview and walk through of the new coding accuracy quality initiatives implemented in 2003 by the LOC.

On July 14, 2003, BearingPoint met with members of the Field Dispatch Center (FDC) in Southfield, Michigan to review process documentation, training documentation, quality review documentation as it relates to trouble ticket coding and quality reviews in the FDC (which is part of the Central Office organization).

On July 15, 2003, BearingPoint accompanied the ISO9000 Audit Team and observed the execution of an official audit conducted in the Southfield, Michigan FDC.

On July 21, 2003, BearingPoint interviewed the Central Office Quality Review Manager responsible for the new Michigan, State wide, Central Office (CO) coding review implemented in March 2003.

On July 30, 2003, BearingPoint interviewed the I&R Field Manager responsible for technicians chosen by BearingPoint for ride-along observations. This interview took place in Livonia, Michigan for the purpose of reviewing process documentation, training documentation, quality review documentation as it relates to trouble ticket coding and quality reviews.

On July 31, 2003, BearingPoint met with members of the Farmington CO in Farmington, Michigan to review process documentation, training documentation, quality review documentation as it relates to trouble ticket coding and quality reviews in the CO.

Review of Plan Actions

All related actions were reviewed and status was provided on the June, 2003 Progress Report.

Review of Transactions

On July 3, 2003, BearingPoint requested a master file of all CLEC trouble reports for services classified as "Specials" that were completed between June 1, 2003 and June 30, 2003 for the extraction of a random sample to be used in official transaction testing.

On July 16, 2003, SBC Midwest provided all requested "Specials" trouble data.

On July 3, 2003, BearingPoint requested a master file of all CLEC trouble reports for services classified as "UNE" that were completed between June 1, 2003 and June 30, 2003 for the extraction of a random sample to be used in official transaction testing.

On July 14, 2003, SBC Midwest provided all requested "UNE" trouble data.

On July 15, 2003, BearingPoint submitted a list of 165 UNE troubles selected randomly by BearingPoint for transaction testing. This was a request for SBC Midwest to provide electronic copies of the detailed trouble histories and trouble logs for each attached UNE trouble.

On July 18, 2003, SBC Midwest provided the requested UNE trouble histories and logs.

On July 21, 2003, BearingPoint requested trouble ticket OSSTRE and OSSLOG reports for 65 "Specials" troubles selected for transaction testing.

On July 29 and 30, 2003, BearingPoint accompanied repair technicians working in the Livonia, Michigan area observing as they performed their normal duties. The technicians selected by BearingPoint were assigned repair activity for CLEC end users.

On August 1, 2003, SBC Midwest provided the Specials data as requested.

Between August 4, 2003 and August 8, 2003, BearingPoint printed, organized and started the coding review for trouble ticket coding accuracy.

On August 11, 2003, BearingPoint submitted to SBC Midwest a list of troubles needing clarification of specific actions related to work performed.

III. NEXT STEPS

1. BearingPoint will continue to perform the review of trouble reports selected for the transaction validation and communicate with SBC Midwest in areas needing clarification.

2. BearingPoint is developing a final report format in which to present the Repair Coding Accuracy Plan results.

August 11, 2003

BearingPoint

Progress Report
SBC Midwest Plan Examination - Directory Listings & Directory Assistance Database Update Accuracy Plan

I. INTRODUCTION

SBC Midwest has filed plans pertaining to Directory Listings and Directory Assistance Database Update Accuracy, Customer Service Record Update Accuracy, and Repair Coding Accuracy. Each plan states that a third-party examination is to be conducted during and after SBC Midwest has completed specified actions. This document explains the current accomplishments and next steps in BearingPoint's analysis of SBC Midwest's actions related to the Directory Listings and Directory Assistance Database Update Accuracy Plan since the last progress report dated June 10, 2003.

II. ACCOMPLISHMENTS

General Planning and Coordination

Beginning June 11, 2003, SBC and BearingPoint held weekly meetings to discuss the timeline and methodology of the test and to address any issues, which might delay the test.

During the week of July 7, 2003, BearingPoint and SBC conducted a joint walk through test to prepare for the examination. SBC provided BearingPoint with a list of all of the completed orders from the week of June 30th to July 3rd. BearingPoint used sampling methods to determine a list of orders to examine for the Directory Listing and Directory Assistance Database Update Accuracy verification. SBC provided screen shots of the LSRs from their systems. BearingPoint used the Directory Listing Inquiry to compare the directory listing updates requested by the LSR and the directory listing as it appears in the customer service record's directory listing section. BearingPoint and SBC reviewed the results of the walkthrough during the week of July 14, 2003. As a result of these discussions, it was agreed that the Directory Assistance database is the source system for determining what is viewed by the Directory Operations personnel and thereby provided to callers and in publications.

Review of Plan Actions

All related actions were reviewed and status was provided on the June 2003 Progress Report.

Review of Transactions

On July 28, 2003, SBC provided BearingPoint with a list of the completed orders from the week of July 21st to July 25th. BearingPoint used sampling methods to determine a sample of the orders. SBC provided BearingPoint with the LSRs for these transactions.

On August 4, 2003, BearingPoint received the list of completed orders from the week of July 28th to August 1st. BearingPoint provided SBC with a sample of the orders and SBC has provided BearingPoint with the LSRs for these transactions. Also, BearingPoint has provided SBC with an additional subset of this list. SBC has provided the EDI files for these transactions. BearingPoint will compare the EDI files with the LSRs.

On August 5, 2003, BearingPoint visited the Directory Assistance Service Center in Troy, Michigan and reviewed the Directory Assistance database. BearingPoint is reviewing the information received in the LSR as compared to the information in the Directory Assistance database to determine whether the directory listings were properly updated.

III. NEXT STEPS

1. BearingPoint currently is conducting the transaction review component of this examination. BearingPoint expects to receive all of the information needed for this examination by August 15, 2003.

2. BearingPoint is planning on conducting two additional visits to the Listings Service Center in Troy, Michigan to review the directory assistance database.

3. BearingPoint currently is developing a final report format in which to present the Directory Listings & Directory Assistance Database Update Accuracy Plan results.

August 11, 2003

BearingPoint

Progress Report
SBC Midwest Plan Examination - Customer Service Inquiry Accuracy Plan

I. INTRODUCTION

SBC Midwest has filed plans pertaining to Directory Listings and Directory Assistance Database Update Accuracy, Customer Service Record Update Accuracy, and Repair Coding Accuracy. Each plan states that a third-party examination is to be conducted during and after SBC Midwest has completed specified actions. This document explains the current accomplishments and next steps in BearingPoint's analysis of SBC Midwest's actions related to the Customer Service Inquiry Accuracy Plan since the last progress report dated June 10, 2003.

II. ACCOMPLISHMENTS

General Planning and Coordination

Beginning June 11, 2003, SBC and BearingPoint held weekly meetings to discuss the timeline and methodology of the test and to address any issues, which might delay the test.

During the week of July 7, 2003, BearingPoint and SBC conducted a joint walk through test to prepare for the examination. SBC provided BearingPoint with a list of all of the completed orders from the week of June 30th to July 3rd. BearingPoint used sampling methods to determine a list of orders to examine for the Customer Service Record Update Accuracy verification. SBC provided screen shots of the LSRs from their systems. BearingPoint used the Customer Service Information Inquiry to compare the updates requested by the LSR and the customer service record. BearingPoint and SBC discussed results of the walkthrough during the week of July 14, 2003.

Review of Plan Actions

All related actions were reviewed and status was provided on the June 2003 Progress Report.

Review of Transactions

On July 28, 2003, SBC provided BearingPoint with a list of LSRs for orders that had been completed during the week of July 21st to July 25th. BearingPoint used sampling methods to select a sample of orders. BearingPoint received screenshots of the LSRs for these orders from SBC. BearingPoint used the

Customer Service Information inquiry to compare the LSR to the customer service record.

On August 4, 2003, BearingPoint received the list of completed orders from the week of July 28th to August 1st. BearingPoint provided SBC with a sample of the orders and SBC has provided BearingPoint with the LSRs for these transactions. Also, BearingPoint has provided SBC with an additional subset of this list. SBC has provided the EDI files for these transactions. BearingPoint will compare the EDI files with the LSRs.

III. NEXT STEPS

1. BearingPoint currently is conducting the transaction review component of this examination. BearingPoint expects to receive all of the information needed for this examination by August 15, 2003.

2. BearingPoint currently is developing a final report format in which to present the Customer Service Inquiry Accuracy Plan results.

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission On Its Own Motion	)	
	)	
Investigation Concerning Illinois Bell Telephone	)	**Docket No. 01-0662**
Company's compliance with Section 271 of the	)	
Telecommunications Act of 1996	)	

SBC ILLINOIS' ELEVENTH STATUS REPORT

Illinois Bell Telephone Company ("SBC Illinois" or the "Company"), by its attorneys, hereby files three (3) status reports pursuant to the progress plans implemented by the Company as part of the 271 review process[1]. As required under the Plans, SBC Illinois will make periodic status reports to the Commission and will file those status reports in this docket.

In this filing, the Company submits a status report on the following plans:

1. Special and UNE Circuit Repair Coding Accuracy Plan. (Bi-monthly reports of third party examination). The attached report dated September 18, 2003 shows that Bearing Point performed a third party examination of the actions required by the Special And UNE Circuit Repair Coding Accuracy Plan. The report shows that Bearing Point verified that SBC Midwest has implemented the documentation updates, training review sessions and management review activities it committed to undertake. In addition, the report shows that, based on a random selection of commercial troubles reviewed in the month of June, 2003, SBC Midwest achieved a UNE repair coding accuracy of 98.38 percent and met the target accuracy level of 95 percent and

[1] The progress plans implemented by the Company include:
1.Bill Auditability and Dispute Resolution Plan;
2. Change Management Communications Plan;
3. Customer Service Inquiry Accuracy Plan;
4. Directory Listings & Directory Assistance Database Update Accuracy Plan,
5. Line Loss Notifier Communications Plan;
6. Pre-Order Processing Timeliness Plan;
7. Special and UNE Circuit Repair Coding Accuracy Plan; and

also achieved a special repair coding accuracy of 94.12 percent and met the target accuracy level of 90 percent. As a result, no further testing by Bearing Point is required and the final process and transaction reports are completed. Under the terms of the Special And UNE Current Repair Coding Accuracy Plan, no further status reports on third party evaluation of repair coding accuracy will be filed.

2. Customer Service Inquiry Plan. The attached report dated September 15, 2003 shows that Bearing Point performed a third party examination of the actions required by the Customer Service Inquiry Accuracy Plan. The report shows that Bearing Point verified that SBC Midwest has implemented the training and management review activities it committed to undertake. In addition, the report shows that, based on a random selection of commercial transactions, SBC Midwest accurately updated 99.1 percent of its customer records and met the accuracy target of 95 percent. As a result, no further testing by Bearing Point is required and the final process and transaction reports are completed. Under the terms of the Customer Service Inquiry Accuracy Plan, no further status reports on third party evaluation will be filed.

3. Directory Listings & Directory Assistance Database Update Accuracy Plan. Bimonthly reports, beginning June, 2003 are due under this plan until final process and transaction reports are completed. Attached to this Status Report is the final process and transaction report for the Directory Listings & Directory Assistance Database Update Accuracy Plan dated September 15, 2003. Under the terms of that plan, no further status reports on Directory Listings and Directory Assistance Database Update Accuracy will be filed.

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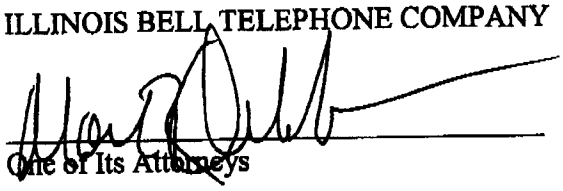
8. Service Order Completion Timeliness Plan (hereinafter, the "Plans").

Respectfully submitted,

ILLINOIS BELL TELEPHONE COMPANY



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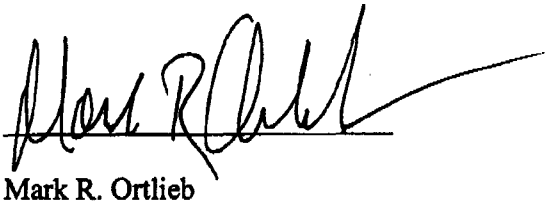
CERTIFICATE OF SERVICE

I, Mark R. Ortlieb, an attorney, certify that a copy of the foregoing **SBC ILLINOIS' ELEVENTH STATUS REPORT** was filed with the Commission via e-docket and served upon all parties electronically on this 23rd day of September, 2003.



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Customer Service Inquiry Accuracy
Third Party Examination Results

September 15, 2003

1.0 Introduction

The *Customer Service Inquiry Accuracy Plan*[1] ("the Plan") provides a list of the actions SBC Midwest asserted it would take as part of an effort to improve the accuracy of customer service inquiries (CSI)[2]. The actions in the Plan fall into the following two categories:

a. Service Representative Training: SBC Midwest asserted that it would develop a Service Order Quality informational package for Local Service Center (LSC) service representatives. This package provided information such as the importance of accurate orders and the impacts of inaccurate orders on Competitive Local Exchange Carriers ("CLECs") and end-users. The informational package was to include service order examples and a listing of available on-line resources.

b. Management Review Activities: SBC Midwest asserted that it would conduct its own internal reviews of UNE-P and Resale production service orders that drop to manual handling to assess whether system and process enhancements and training review sessions achieved the desired effect (i.e., improvement in CSI accuracy).

BearingPoint was selected to perform a third party examination of the actions stipulated in the Plan. The third party examination requirements as stated in the Plan fall into two categories:

a. The third party will evaluate SBC Midwest's implementations of the actions described in the "Actions" section of the Plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC Midwest's quality review results.

b. The third party will report on the accuracy of customer service inquiry updates by comparing the Customer Service Record (CSR) updates requested with the local service requests (LSRs). The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC Midwest and the respective Commission Staff prior to its implementation.

BearingPoint has fulfilled the third party examination requirements and considers its work completed. This document explains the results of BearingPoint's third party examination.

[1] As filed with the Michigan Public Service Commission on March 13, 2003, the Illinois Commerce Commission on May 1, 2003, the Wisconsin Public Service Commission on July 1, 2003, the Public Utilities Commission of Ohio on July 3, 2003, and the Indiana Utility Regulatory Commission on July 11, 2003.
[2] This issue is related to Exception 31 in the Ohio test and Exception 128 in the Illinois test.

2.0 Methodology

BearingPoint developed an Examination Approach for the Customer Service Inquiry Accuracy Plan outlining the methodology used for the third party examination. The document describes the fact finding and analysis approach used to assess the evidence of SBC Midwest actions taken and the methodology used in performing a transaction review of commercial transactions to verify the CSI update accuracy.

To evaluate the system and process enhancements made by SBC Midwest, BearingPoint requested artifacts of the enhancements for review. The evaluation of the training review sessions and the management review activities were completed through work center visits and employee interviews. BearingPoint reviewed documentation for pertinent information such as process descriptions, training schedules, employee training records, quality reports, discrepancies identified, root cause of discrepancies identified, and reports used for management oversight.

SBC Midwest provided BearingPoint with a list of all orders that completed during the week of July 21, 2003 to July 25, 2003. The list contained relevant ordering information, as well as the completion date for each of the orders.

BearingPoint selected a sample of 150 orders from the population. BearingPoint reviewed hard copies of the Local Service Requests ("LSRs") for each order. BearingPoint compared the LSRs to the Customer Service Records returned through CSIs to determine whether the Customer Service Records were updated accurately.

This activity was repeated for the weeks of July 28, 2003 to August 1, 2003 and August 4, 2003 to August 8, 2003. A total of 450 orders were examined throughout the course of the three-week examination.

3.0 Review of SBC Midwest Planned Actions

The following table is a summary of the third party examination results of SBC Midwest's planned actions.

ID	SBC Midwest Actions	Third Party Examination Results
	Training Review Sessions	
1	SBC developed for Local Service Center ("LSC") service representatives a Service Order Quality informational package directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during training to service representatives involved in producing SBC Customer Information System ("ACIS") service orders. This package provides information such as the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002, and applies across the entire SBC Midwest region. Starting in January 2003, service representatives will receive training using the Service Order Quality informational package. • The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003. • The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system. • Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance. A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to service order accuracy.	BearingPoint was provided copies of the Service Order Quality informational package provided to SBC service representatives, as well as the Facilitator's Notes used to lead the training. BearingPoint attended the training session conducted on May 7, 2003. The training session was conducted at the Local Service Center (LSC) in Grand Rapids, Michigan and was attended by Local Service Representatives from each of the LSCs. The training began with "Talking Points" given by one of the Area Managers. The Talking Points emphasized the importance of the training and the need for accurate updates. The training lasted approximately three hours and covered the impacts of inaccurate orders, ways to avoid incorrect order entries, and ways to correct an inaccurate order. The training concluded with a "Knowledge Check" made up of ten questions from the material in the training session. All of the Service Representatives were required to pass the Knowledge Check with 100 percent accuracy in order to receive credit for the training. BearingPoint was provided with copies of the attendance records for the training, the list of Managers who addressed the class, and the list of "Talking Points" used by the Managers.

	Management Review Activities	

2	SBC is designing an internal quality review process for CSI accuracy. This review will rely on sampling UNE-P and Resale production service orders that drop to manual handling ("manual-manual" and "auto-manual") to monitor CSI accuracy. Initially, the reviews are intended to be conducted daily.
	• Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System ("DSS"). DSS is a reporting system used by the LSC to track and capture information on order activity. The DSS system is separate from the systems that process the actual production order.
	• The criteria for sampling will include product type and process type. Sampled orders will come from both manual-manual and auto-manual orders.
	• Quality Assurance ("QA") service representatives, experienced service representatives selected for this purpose, will conduct reviews using methods and procedures developed specifically for this process.
	• Potential order discrepancies will be reviewed to:
	  • Verify that discrepancies are in fact errors;
	  • Correct identified errors on pending orders;
	  • Identify root causes of errors;
	  • Provide the basis for individual coaching of service representatives.
	The QA service representatives will compare the CLEC Local Service Request to the corresponding internal service order on a field-by-field basis. Corrections will be made as necessary.
		BearingPoint interviewed members of the Quality Review team in Milwaukee, Wisconsin on June 16, 2003.
		
		During the interview, BearingPoint was provided a copy of "Quality Assurance Methods & Procedures" for Resale and UNE-P products. These documents describe the quality review process used by SBC Midwest in detail.
		
		BearingPoint was provided with copies of the "Error Coaching Plan" and "Coaching Forms". These forms are used to identify opportunities for coaching and facilitate the coaching of service representatives.
		
		BearingPoint was provided with copies of the reports generated by the LSC Support Staff. These reports are provided to Area Managers, Line Managers, and Service Representatives to identify areas for improvement and to recognize teams and team members for achieving high accuracy rates.
		
		BearingPoint was provided with a sample report used by SBC Midwest to identify common mistakes and descriptions regarding how to avoid these mistakes. The report is provided to Area Managers, Line Managers and Service Representatives on a weekly basis and also provides the number of errors found from the previous week's quality review.

4.0 Commercial Transaction Review Results

Using a random selection of commercial transactions completed from July 21, 2003 to August 8, 2003, BearingPoint reviewed customer service inquiry updates. Customer Service Records were examined to verify that the activities requested on LSRs were reflected accurately. If a subsequent customer order request was received between the date of a selected Local Service Request and the date that the CSI was examined, BearingPoint requested a copy of the subsequent order. These orders were examined as part of the sample.

Based on a review of 450 transactions, BearingPoint found that 446 (99.1 percent) had been updated accurately. Accordingly, BearingPoint's evaluation of SBC Midwest's Customer Service Inquiry Accuracy Update demonstrates that the 95% target has been achieved. This represents the same benchmark BearingPoint used during its operational testing. The following tables summarize the results of the transaction review.

Table 1-1: Customer Service Inquiry Accuracy

	Examined	Accurate	Inaccurate	Percentage
Week 1	150	149	1	99.3%
Week 2	150	150	0	100%
Week 3	150	147	3	98.0%
Total	450	446	4	99.1%

Table 1-2: Transactions Examined by Request Type[3]

	AB	BB	CB	EB	MB	Total
Week 1	26	1	0	1	122	150
Week 2	23	8	0	3	116	150
Week 3	22	1	2	2	123	150
Total	71	10	2	6	361	450

Table 1-3: Transactions Examined by Activity Type[4]

	B	C	D	N	R	S	T	V	Total
Week 1	3	23	27	22	2	11	2	60	150
Week 2	1	32	13	25	2	7	3	67	150
Week 3	0	33	21	19	2	11	2	62	150
Total	4	88	61	66	6	29	7	189	450

Table 1-4: Transactions Examined by State

	IL	IN	MI	OH	WI	Total
Week 1	42	22	45	31	10	150
Week 2	39	16	41	38	16	150
Week 3	38	20	47	28	17	150
Total	119	58	133	97	43	450

[3] Request Types: AB = Loop Service, BB = Loop Service with Number Portability, CB = Number Portability, EB = Resale Service, and MB = Combined Loop with Unbundled Local Switching.
[4] Activity Types: B = Restore, C = Change, D = Disconnect, N = New Install, R = Record Change, S = Suspend, T = Outside Move, V = Conversion with Change.

Repair Coding Accuracy
Third Party Examination Results

September 18, 2003

1.0 Introduction

The *Special and Unbundled Network Element (UNE) Circuit Repair Coding Accuracy Plan*[1] ("the Plan") provides a list of the actions SBC Midwest asserted it would take as part of an effort to improve the accuracy and completeness of trouble ticket closure coding[2]. The actions in the Plan fall into the following three categories:

a. Documentation Updates: SBC Midwest asserted that it would initiate a number of improvements in the documentation available to technicians and managers on proper coding techniques and application.

b. Training Review Sessions: SBC Midwest asserted that it would conduct comprehensive awareness and training sessions with personnel in each of the four work groups (Central Office [CO], Special Services, Installation and Repair [I&R] and the Local Operations Center [LOC]) involved in trouble ticket closures.

c. Management Review Activities: SBC Midwest asserted that it would conduct its own internal reviews of trouble ticket closures in each of the four work groups involved to assess whether improvements to documentation and the training/awareness sessions achieved the desired affect (i.e., improvement in coding performance).

BearingPoint was selected to perform a third party examination of the actions stipulated in the Plan. The third party examination requirements as stated in the Plan fall into two categories:

a. The third party will evaluate SBC Midwest's implementations of the actions described in the "Actions" section of the Plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC Midwest's quality review results.

b. The third party will report on coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found for UNE and Special Circuits to the narrative contained in the trouble report using a nonbiased sample from commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC Midwest and the respective Commission Staffs prior to its implementation. In addition, BearingPoint may supplement its analysis using "ride-alongs" with repair technicians, consistent with its standard evaluation practices for UNE trouble reports in Michigan.

BearingPoint has fulfilled the third party examination requirements and considers its work completed. This document explains the results of BearingPoint's third party examination.

[1] As filed with the Michigan Public Service Commission on April 2, 2003, the Illinois Commerce Commission on May 1, 2003, the Wisconsin Public Service Commission on July 1, 2003, the Public Utilities Commission of Ohio on July 3, 2003, and the Indiana Utility Regulatory Commission on July 11, 2003.
[2] This issue is related to Exception 131.

2.0 Methodology

BearingPoint developed an Examination Approach for the Repair Coding Accuracy Plan outlining the methodology used for the third party examination. The document describes the fact finding and analysis approach used to assess the evidence of SBC Midwest actions taken and the methodology used in performing a transaction review of commercial trouble ticket histories.

To evaluate the documentation updates made by SBC Midwest, BearingPoint requested copies of the specified documents for review. The documents used by the work centers were reviewed during work center visits to determine whether updated documentation was being used in trouble coding.

The evaluation of the training review sessions and the management review activities were completed through work center visits, employee interviews, and field work observations. BearingPoint reviewed documentation for pertinent information such as process descriptions, training schedules, employee training records, quality reports, samples of trouble tickets, discrepancies identified, root cause of discrepancies identified, and reports used for management oversight. Additionally, field work activity was used to collect information regarding SBC Midwest implementation of documented procedures.

Locations visited for interviews and observations were selected by BearingPoint from SBC Midwest's master list of work centers. BearingPoint selected technicians for ride-along observations from a list of qualified[3] technicians expected on duty on a specific business day.

Prior to the examination of transactions, a process for selecting commercial UNE and Special troubles for review was established. BearingPoint requested SBC Midwest to provide a master list of CLEC trouble reports for a specified period of time. BearingPoint selected a sample from the master list for review and provided the sample list to SBC Midwest. In turn, SBC Midwest provided BearingPoint with the trouble histories and logs for the selected troubles.

BearingPoint established that a sample of 150 UNE troubles from Michigan[4] and 50 Special troubles from the five state SBC Midwest region[5] would be selected for review. The sample was drawn from troubles cleared/service restored during June 2003. Additionally, troubles observed on the two scheduled ride-along observations were included in BearingPoint's sample. In cases where a selected trouble could not be evaluated based on the narrative provided, BearingPoint removed this trouble from the sample and replaced it with the another trouble.

[3] "Qualified technicians" in this context are those technicians that are assigned CLEC troubles as part of their normal work distribution.
[4] UNE coding accuracy results were below the desired accuracy level only in Michigan.
[5] Although coding accuracy for specials in Wisconsin met the desired accuracy level, the random sample for transaction testing was taken from a master file of all specials for all five states.

3.0 Review of SBC Midwest Planned Actions

The following table is a summary of the third party examination results of SBC Midwest's planned actions.

ID	SBC Midwest Actions	Third Party Examination Results
	Documentation Updates	
1	The SBC Midwest document that is used as a reference for Cause Codes was updated to clarify use of Cause Code 600 in late June 2002. Cause Code 600 is used to identify those situations where SBC Midwest is unable to determine what caused a particular case of trouble. This documentation gap was identified via a number of cited trouble tickets for both Special and UNE circuits. The updates to the documentation provided a clearer description of the process currently followed by SBC Midwest technicians and addressed questions raised by BearingPoint. The updated SBC Midwest document was provided to BearingPoint for review on August 1, 2002.	BearingPoint was provided a copy of the document SBC-660-169-014, "AMERITECH CAUSE CODES LOOP MAINTENANCE OPERATIONS SYSTEM (LMOS) AND WAFC", issued on June 9, 2002. The document includes an updated definition of Cause Code 600 removing restrictions for the disposition codes with which it can be used. During interviews and work center visits, BearingPoint observed that work groups were using the current definition for Cause Code 600.
2	Local Operations Center (LOC) Job Aid JA-27B has been updated to reflect additional steps for Maintenance Administrators (MA) to take that will improve coding accuracy when a mechanized loop test (MLT) indicates "Open Out" following a circuit retest. MAs and managing supervisors responsible for the accurate coding of closed trouble tickets in the LOC were covered on this process enhancement between August 1, 2002 and August 9, 2002.	BearingPoint was provided a copy of job aid LOC JA-27B, "Basic Questions to Ask-Resale/UNE-P", dated July 17, 2001 and revised on October 22, 2002. The document includes additional steps under the heading "*Important: If testing a VER Code 41 or 0L (Open Out 100% Balanced) proceed with the following steps*:" During an interview at the LOC, BearingPoint noted that this Job Aid was communicated through the "What's New" web page that employees are expected to review at the start of each day.

3	SBC Midwest updated internal Methods and Procedures (M&P) documentation (SBC 660-169-013) used to define accurate disposition coding of trouble tickets to include new disposition codes and clarify the use of existing disposition codes. Updates to the M&P were completed on August 16, 2002. These updates also generated the following outputs: • Installation and Repair (I&R) internal Job Aid (JA 170 - August 20) was updated to reflect the M&P changes/clarifications. Awareness sessions were conducted August 23, 2002 through November 5, 2002 to review updated procedures. • A LOC "Flash" (02RC49) was issued August 26, 2002 to reflect the new disposition codes. The Customer Service Bureau (CSB) Handbook was updated August 26, 2002 to reflect the new disposition codes. SBC Midwest issued a CSB "Flash" to notify CSB personnel of updated handbook procedures.	BearingPoint was provided a copy of SBC-660-169-013, "AMERITECH DISPOSITION CODES LOOP MAINTENANCE OPERATION SYSTEM (LMOS) and WFAC", issued August 17, 2002 and updated July 18, 2003. SBC Midwest provided a copy of job aid SBC-JA-000-000-170 issued August 16, 2002. BearingPoint conducted interviews with two SBC Midwest I&R Field groups, one I&R Control Center and the LOC. During the first I&R Field group interview, Job Aid JA 170 was unavailable for review. Additionally, the primary Job Aid utilized by technicians (SBC-JA-000-000-043) was outdated in both the paper and online versions. This issue was raised with SBC Midwest, which took corrective action. During a second interview, BearingPoint observed that the online document was updated. The technicians indicated that the online documentation was to be a primary source of coding information. Additionally, paper copies of coding documentation had been removed from the vehicles, according to the technicians interviewed. With respect to Awareness Training, SBC Midwest managers indicated that both formal and informal training is provided to the technicians. After completion, formal training is documented in employee personal training records in the Training Information Warehouse (TIW) database. Informal training (or "Tailgate Training") is provided as work assignments are distributed. This ordinarily includes a handout or job aid along with a brief overview. Informal training does not require employee training record updates. At the first I&R Field interview, SBC Midwest provided a copy of a "Tailgate Training" handout which indicated that coding-specific training was conducted in August 2002. At the second I&R Field interview, TIW database records were reviewed. The August 2002 training was found posted to employee records. During BearingPoint's review at the LOC, BearingPoint observed that both the "What's New" web page and the updated online CSB Handbook were updated with the information from the 02RC49 Flash.

4	On December 16, 2002 Central Office Technician method and procedure documentation (SBC 002-216-298) was issued for documenting corrective maintenance trouble tickets in Central Offices (COs). A requirement for performing quality checks on coding has also been incorporated into the frame management document SBC 002-531-045 (CO Managers Frame Reference Guide – AIT Region).	BearingPoint was provided a copy of the document SBC-002-216-298, "TRANSPORT & FRAME: WFA/DI Corrective Maintenance Trouble Tickets", dated November 18, 2002. The document includes instruction as to the types of conditions found in the CO requiring a corrective maintenance trouble ticket. It also explained how to issue and close such trouble tickets. BearingPoint was provided a copy of the document SBC-002-531-045, "Frame Midwest: CO Manager's Frame Reference Guide", dated April 9, 2003. This document includes "Apply the proper Disposition and Cause Codes" in the list of work functions to be observed in the quality review process. During an interview with a CO Manager on July 31, 2003, it was noted that each week one completed work operation (processing of trouble report, independent work request, etc.) for each individual is reviewed for quality and thoroughness. If a work activity under review involved completion of a repair, the codes used were reviewed for accuracy.

	Training Review Sessions	
5	SBC Midwest conducted training review sessions (a/k/a awareness sessions) to reinforce current procedures used for the close-out of Cable Multiple tickets when wholesale account trouble tickets are attached to the lead cable trouble ticket number. Sessions covering all Installation and Repair (I&R) Operations Center personnel were completed by August 13, 2002. A "Cable Multiple" ticket number is assigned to a damaged cable or cable failure that potentially impacts service to multiple subscribers served by the same cable. Individual subscriber (or CLEC) reports of service interruptions having individually assigned trouble ticket numbers may become attached to the lead or Multiple Cable Trouble Ticket Number (CTTN). SBC Midwest was made aware that in at least two audited instances, individual wholesale trouble reports attached to a Cable Trouble Ticket Number were closed as the CTTN closed and were not "detached" and tested to confirm restoration of the reported trouble. Reinforcement of current procedures to detach individual case trouble tickets from the CTTN and retest with the CLEC was completed for I&R Operations Center employees through Awareness Sessions conducted between August 8, 2002 and August 15, 2002.	SBC Midwest's Wholesale Staff distributed the new process to work centers with a requirement to complete training by August 13, 2002. Each work center was required to return a confirmation notice indicating that training was complete. BearingPoint was provided copies of the e-mail confirmations returned from the work centers stating the training was completed. During the interview with the I&R Control Center on June 19, 2003, BearingPoint requested evidence that training was performed as reported. The I&R Control Center provided a copy of the training schedule indicating the topic of training, the names of employees that attended training, the dates training took place, and a copy of the handout provided during training.
6	SBC Midwest conducted awareness sessions to reinforce current procedures used for the disposition coding of trouble reports closed when multiple faults are found on the same telephone line. • Sessions covering Installation and Repair field technicians in all manager groups were completed by August 12, 2002. • Additional training sessions with I&R personnel were conducted in November 2002.	BearingPoint was provided with confirmation messages indicating that the training was complete. During interviews, I&R Managers indicated that the technicians understood the rule and verified that training was performed as documented. I&R Control Center personnel, while not specifically required, also were trained regarding the process. SBC Midwest noted that the training session provided in November 2002 covered the newly updated I&R Maintenance "No Access" Policy. This training did include coding information, but was not specific to coding awareness.

7	Additional review sessions for LOC personnel were conducted to reinforce accurate trouble closure procedures were completed by November 10, 2002.	In an interview with LOC personnel on July 1, 2003, BearingPoint requested evidence of the training session. Training staff in the LOC provided a copy of the training agenda showing topics covered and a training schedule listing each employee trained. BearingPoint selected four names from the master list and requested copies of the individual employee training files from the TIW system. All four employee files included entries showing attendance the same date as reflected on the training schedule.
8	Review training sessions were conducted with Special Service Center personnel to reinforce correct trouble ticket coding procedures. These review sessions were completed by November 25, 2002.	SBC Midwest personnel sent an e-mail to the Special Services Organizations explaining that awareness sessions with the InterExchange Carrier (IECC), General Business Center–West (GBC-W), General Business Center-East (GBC-E), AT&T, and Special Service Centers were to be completed by November 25, 2002. Each organization was required to return a confirmation notice indicating that training was completed. SBC Midwest provided BearingPoint with copies of the e-mail notification correspondence and copies of the responses indicating that training requirements were met and training had been completed. During subsequent interviews with the Area Managers, BearingPoint was made aware that initial training sessions were requested for all employees in trouble ticket coding procedures. Area Managers were unable to confirm that the email responses reference the initial training or the review sessions. The managers stated that trouble ticket coding procedures are regularly covered topics during informal training sessions, but that these training sessions are not documented.

9	Review sessions were conducted through January 31, 2003 with SBC Midwest Central Office technicians in Michigan, Ohio, Indiana, and Illinois manager groups to review the newly created Methods and Procedures for documenting trouble tickets and established procedures for proper trouble ticket coding.	SBC Midwest provided BearingPoint e-mail correspondence indicating that the training occurred. On July 31, 2003, during an interview with the CO Manager in the Farmington, Michigan Central Office, BearingPoint requested documentation demonstrating that training was completed. The CO Manager provided an e-mail indicating the requirement to cover specific coding related topics and the response that was returned by his organization. Additionally, the CO Manager provided a copy of his confirmation notice indicating that training was completed with an attached document showing the topic covered, names of those trained, and the date that training took place.
10	On February 10, 2003, the LOC began conducting workshops to review closure codes and appropriate usage of these codes. These workshops will continue until the desired level of accuracy is achieved.	During an interview with members of the LOC, BearingPoint requested LOC documentation related to the establishment of workshops for the purpose of reviewing closure codes and appropriate usage of these codes. The LOC provided documentation and stressed their establishment of a 98% coding accuracy requirement for employees rather than the 95% required by SBC Midwest. The LOC provided BearingPoint with an overview of the workshop program and a copy of the "Discussion Outline" used in training with a list of reference documentation used. Additionally, BearingPoint was provided a list of names of those trained, and the date that training took place. Also, BearingPoint was provided with evidence showing that on-going training was being conducted, which began on July 9, 2003.
11	On February 3, 2003, LOC associates were provided visual aids to identify commonly made coding errors and the recommended corrective actions.	SBC Midwest provided BearingPoint with copies of visual aids used by the LOC to develop an awareness of common coding errors with associates. Additionally, BearingPoint observed the posters throughout the work areas within the LOC. The posters are designed to draw attention to some potential errors in coding.
12	A coding refresher review session will be conducted within each of the four work groups (i.e., LOC, I&R, Special Services Center and Central Office) within one year of the training sessions described above (August 2002 Awareness).	BearingPoint conducted interviews with each of the four organizations between June 15, 2003 and July 31, 2003. The annual review sessions were not scheduled to begin until after August 1, 2003. BearingPoint was provided with documentation indicating that training began on August 5, 2003. The documentation indicated the topics covered, names of those trained, and the date that training took place.

13	Training packages for new technicians in all four work centers already contain trouble disposition and coding and will continue to be part of the training program.	During interviews, BearingPoint was provided training documentation from each of the four groups. BearingPoint noted that trouble disposition and coding are part of new employee training. Additionally, through work observations, it was noted that system training for each group had coding elements included.
	Management Review Activities	
14	**Local Operating Center Review:** On October 30, 2002, LOC management initiated monthly quality reviews of coding accuracy on employee trouble tickets closures.	BearingPoint interviewed LOC employees on July 1, 2003 and observed work activity focusing on improving coding accuracy. During the interview, the LOC provided BearingPoint a copy of the monthly quality review process. The review was structured with stated requirements for Front Line Managers, the Operations Manager, and the Area Manager. The process provided the steps to be followed in performing the monthly quality review and specified data storage requirements. A copy of the LOC Quality and OB Form used for scoring reviews was provided. BearingPoint was provided a copy of the Front Line Manager Expectations document, which outlines specific duties and activities Front Line Managers are expected to perform as part of the normal job. One of the items listed was "Perform quality observations and quality checks" and the Performance Standard for this item notes, "two observations and three quality checks are performed monthly on each team member. Success Plans are necessary when employee performance is unsatisfactory." The LOC personnel explained that Success Plans are utilized for employees with unsatisfactory job performance. The Front Line Manager is responsible for preparing a corrective action plan to help the employee obtain additional training, closer supervision or whatever is determined to be appropriate to improve performance. The LOC allowed BearingPoint to observe Front Line Managers performing quality reviews. BearingPoint observed both the LMOS and WFA/C groups performing quality reviews, which included coding accuracy. The quality reviews performed were consistent with the published process.

15	In December 2002, LOC management initiated bimonthly random reviews of trouble ticket closures. The results of these reviews are tracked and reported via an internal shared-access tracking mechanism.	During the July 1, 2003 interview with the LOC, BearingPoint requested evidence supporting the bimonthly review of trouble ticket closures. The LOC provided a written copy of the process, which outlined the responsibilities of management employees, including the process steps, data storage requirements, and requirements for data retrieval for audit purposes. BearingPoint was provided a detailed explanation of the process and allowed to observe the aspects of the process in progress at the time. The process observed was consistent with the published process.
16	On February 10, 2003, LOC management initiated a "Ticket Closure Approval Team" for Resale/UNE-P trouble tickets. LOC MAs will be required to receive approval prior to closing a trouble ticket until an individual 95% accuracy rate is achieved.	During the July 1, 2003 interview and observation meeting at the LOC, BearingPoint requested documentation supporting the implementation and execution of the new Ticket Closure Approval Team and associated process. The LOC provided a copy of Flash 03JT01, "Ticket Closure Approval Process", dated February 27, 2003. This document describes the process used to close LMOS trouble tickets. Employees that have achieved a 95% accuracy level and have closed 40 or more troubles are qualified to close LMOS troubles without a review. However, other employees are required to put the appropriate codes in the narrative along with a description of the work completed and place a trouble in a status of "IIHOLD" for review and closure by a qualified employee. BearingPoint observed troubles placed in "IIHOLD", which were subsequently reviewed and closed. The observed process was consistent with the published process. BearingPoint was provided copies of master tracking spreadsheets as well as the individual team qualification spreadsheet.

17	On February 10, 2003 LOC management also initiated a daily review of the prior day's UNE-Loop trouble ticket closures to validate correct trouble ticket and analysis codes. MA errors are provided to the involved employee as well as the LOC staff, both as a method to improve the individual accuracy, as well as identify common misinterpretations.	During the interview and observation meeting with the LOC on July 1, 2003, the review of the previous day's UNE-Loop troubles was discussed. BearingPoint was provided a copy of the process for receipt, sorting, and review of the daily scrub list. BearingPoint observed the review of UNE-Loop trouble ticket closures. As each trouble was reviewed, the reviewer would place a code in the SFI field in WFA/C that would represent the findings. Based on the SFI code used, the LOC can pull reports, identify errors, and review accuracy rates.
18	**Special Services Center Review:** To monitor the accuracy and completeness of trouble ticket coding, the trouble ticket coding review has been incorporated into the regularly scheduled quality control measures utilized by the Special Services management. This effort began December 2002.	SBC Midwest provided a copy of the new ticket review procedure to BearingPoint. On June 19, 2003, BearingPoint reviewed the new ticket review procedure with representatives from the IECC and GBC-E centers. The coding awareness was part of the review process as documented. At the end of the employee quality review, the results are posted to a Maintenance Quality Checklist form. This form shows the accuracy of each trouble report reviewed and the monthly average. This record informs employees of their current efficiency level and is used in the employee evaluation at the end of the year.
19	**Installation and Repair Centers Review:** The I&R management will incorporate coding accuracy into the current auditing processes to review the efficacy of the above-cited measures and identify corrective action when required to improve trouble ticket coding accuracy for Special and UNE circuit trouble reports.	In addition to the work group quality reviews, SBC Midwest has initiated a monthly staff audit. BearingPoint interviewed the Staff Quality Results Manager on June 19, 2003. The Staff Quality Results Manager is responsible for the execution of the monthly staff audit and develops a monthly report across the 70 Area Manager domains. BearingPoint conducted interviews and observations with I&R Field and I&R Control Center managers on June 19, 2003 and found that both are required to perform quality reviews of closed repair tickets and that coding was a key element of each review. BearingPoint noted that Field Front Line Managers are required to review at least two troubles per employee per month. They are required to use a mechanized form. Results are posted online and included in employee evaluations. BearingPoint was allowed to observe as several trouble tickets were reviewed and results scored.

20	**Central Office Review:** Beginning in March 2003, a monthly sample of closed CLEC trouble tickets in Michigan will be reviewed for narrative and coding accuracy.	On July 21, 2003, BearingPoint interviewed the Manager responsible for the execution of the monthly Central Office (CO) CLEC trouble ticket review. The manager provided BearingPoint with a written copy of the process steps used to review closed trouble tickets. According to the manager responsible for the monthly CO CLEC trouble ticket review, between 200 and 300 troubles are reviewed each month. The Training and Development Manager is required to produce a report containing the following fields: • Category of Report (CO) • Base (number evaluated) • Number Closed Accurately • Number Closed Inaccurately, and • Percent Closed Accurately A copy of the summary report is to be forwarded to various levels within the company.
21	**International Organization for Standardization (ISO) Audits Review:** In addition to these targeted coding review sessions SBC Midwest has incorporated trouble ticket coding into its internal ISO audits which are conducted approximately every three months within the various work centers. If significant ticket coding problems are identified during these ongoing audits, SBC Midwest will initiate new training/awareness sessions with the groups involved.	BearingPoint interviewed the Quality Assurance Manager responsible for the ISO Audit program on June 25, 2003. During the interview, the ISO9000 audit process was discussed. To be an auditor, an employee must show interest and volunteer to join the audit team. Local management selects the most qualified employees to form the audit team. If selected, employees are provided four days of training covering the process, forms, reports, roll play sessions, and testing. On the third day of training, a test is administered -- to continue in the program an employee must score a minimum of 80 percent on the test. Employees assist a lead auditor for three or four audits before they can lead an audit. BearingPoint accompanied the ISO Audit Team on July 15, 2003 and observed the performance of an audit in the Field Dispatch Center responsible for dispatching work to central office technicians. BearingPoint observed the pre-audit preparation session and the audit through ticket review. The ticket review portion of the audit included a review of codes.

4.0 Commercial Transaction Review Results

Using a random selection of commercial troubles completed in the month of June 2003, BearingPoint performed a review of UNE troubles in Michigan and a review of Specials troubles taken from a five-state area master list to evaluate coding accuracy.

- UNE Results: Based on a review of 154 UNE troubles, the repair coding accuracy in Michigan was found to be 98.38 percent. SBC Midwest has met the target accuracy level of 95 percent as stated in the plan.

- Specials Results: Based on a review of 51 Special troubles, the repair coding accuracy in SBC Midwest was found to be 94.12 percent[6]. SBC Midwest has met the target accuracy level of 90 percent as stated in the plan.

The following table reflects the number of specials troubles reviewed across the SBC Midwest area:

Table 1-1: Specials Troubles Examined by State

Michigan	9
Ohio	10
Wisconsin	6
Illinois	26
Indiana	0
Total	**51**

[6] This result would meet the 95% accuracy benchmark used for UNE Specials in the OSS test when the p-value (0.4725219) is taken into consideration.